

April 1998

Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP, Room 4007-S Ag Stop 0275
POB96456
Washington, D.C. 20090-6456

Re: Federal Register Docket #TMD-94-00-2

Dear Ms. Stommes:

I am writing as a concerned consumer about the proposed National Organic Program Rule. Several aspects of the proposed Rule are enormously upsetting to me and potentially mislead what "organic" means.

- Section 205.13-205.15: would allow 20% non-organic feed, livestock confinement operations and widespread drug use applied to a standard that now requires 100% organic feed, limited antibiotic use and prohibits the refeeding of animal parts and manure.
- Section 205.421-205.425: Small farmers and processors will pay a disproportionate share for certification. Small operators will need a sliding scale fee to reduce the financial impact rather than be penalized for simply being small.
- Section 205.301: The proposed rule allows the USDA to pre-empt the word "organic". Growers and processors and consumers who insist on high standards for organic produce and livestock will automatically be integrated into standards of the National Organic Program whose standards are below what I care to refer to as "organic".

Please also reconsider the growers and consumers wishes concerning p.65875 Vol. 62, No. 24 Fed. Reg: Genetically Engineered Organisms are not organic and if used should be mentioned on the label. p.65892-65893 Vol. 62 Fed. Reg: allows municipal sludge in organic farming. Human waste has too many potential pathogens and concentrated heavy metals and is, therefore, unsuitable for organic farming. p.65884, Vol. 62, No. 24 Fed. Reg: Ionizing Radiation is not compatible with organic foods. Safe sanitation practices eliminate this practice.

As an American consumer I feel I have the right to be well informed about what my family and I eat. The term "organic" must remain meaningful and helpful to all consumers. As such, I strongly oppose the items mentioned above concerning the National Organic Program.

Sincerely,